



U.S. Department of Justice

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May 3, 2021

Honorable Robert B. Kugler
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza, Room 6040
Camden, NJ 08101

**Re: *United States v. Salvatore Pelullo*
Criminal No. 11-740 (RBK)**

Dear Judge Kugler:

Now that defendant Salvatore Pelullo's reply brief in his pending appeals will be filed in the Third Circuit this Thursday, May 6, the United States respectfully requests that the Court direct that he be transferred back to his place of permanent confinement, FCI Coleman.

The Court has been more than generous to Pelullo in allowing him to remain in the Philadelphia Federal Detention Center for years, first to participate in the remand proceedings, then to assist his attorney in the filing of his appellate briefs. The Court also permitted Pelullo to remain in the FDC to facilitate his involvement in family counseling last fall. But Pelullo should now be treated like other sentenced prisoners.

Moreover, according to FDC officials, Pelullo has repaid the Court's generosity by violating BOP prohibitions against the misuse of controlled substances and was sanctioned for such misuse in 2020. Moreover, FDC staff has informed me that they would prefer that Pelullo be returned to FCI Coleman because the FDC does not house male designated inmates and FCI Coleman will better provide for Pelullo's security and programming needs.

Respectfully submitted

RACHAEL A. HONIG
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By: 
NORMAN GROSS
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cc: Troy Archie, Esq., counsel for Salvatore Pelullo, by ECF and email